

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-60 are pending in this application, Claims 1-17, 19-23, 27-51, 53-56, and 60 having been withdrawn, Claims 18, 24, 25, 26, 52, 57, and 60 having been amended. Support for the amendments to Claims 18, 52, and 57 is found, for example, at page 19, lines 3-8, page 68, lines 3-6, and Fig. 41 of the present application. Claims 26 is amended to be written in independent form. Support for the amendment to Claim 26 is found, for example, in Fig. 20A. Claim 25 is amended to be written in independent form. Claims 24 and 60 are amended to correct minor informalities. Applicants' respectfully submit that no new matter is added.

In the outstanding Office Action, Claims 24 and 25 were objected to; Claims 18, 24-26, 52, 57, and 58-60 were rejected under 35 U.S.C. §102(b) as anticipated by Yamaguchi et al. (U.S. Patent No. 5,801,746, hereinafter Yamaguchi).

With respect to the objection to Claims 24 and 25, Applicants respectfully submit that this ground of objection is overcome by the present amendments to Claims 24 and 25. Accordingly, Applicants respectfully request that the objections to Claims 24 and 25 be withdrawn.

With respect to the rejection of Claim 18 as anticipated by Yamaguchi, Applicants respectfully traverse the rejection. Amended Claim 18 recites, *inter alia*, "wherein the plurality of imaging units include a plurality of toroidal lenses having an optical face tangle error correction function of the deflection unit, and each of the plural toroidal lenses images the respective light beams deflected by the deflection unit in a spot on the corresponding surface to be scanned." Yamaguchi does not disclose or suggest this feature of amended Claim 18.

Col. 3, lines 9-10 of Yamaguchi discloses that only one set of the image-forming lens or  $\theta$  lenses is provided to all laser beams.

Furthermore, Yamaguchi discloses that post-deflection optical system 21 includes first to third image-form lenses 27, 29, and 31 so as to provide a predetermined aberration characteristic to four laser beams L (Y, M, C, and B), which are deflected by the respective reflecting surfaces of the polygonal mirror unit 5, in the wide scanning width.<sup>1</sup> That is, the entire length area of the main scanning direction at the photosensitive member 58 (Y, M, C, B) of the laser beam scanned on the image surface by the polygonal mirror unit 5. Also, the first to third image form lenses 27, 29, and 31 are used to control the variation of the photosensitive member 58 (Y, M, C, B) of each laser beam.

Thus, the claimed invention is distinguished over Yamaguchi in that the plurality of imaging units include a plurality of toroidal lenses having an optical face tangle error correction function of the deflection unit, and each of the plural toroidal lenses images the respective light beams deflected by the deflection unit in a spot on the corresponding surface to be scanned.

In view of the above-noted distinctions, Applicants respectfully submit that amended Claim 18 (and any claims dependent thereon) patentably distinguish over Yamaguchi. In addition, amended Claims 52 and 57 recite elements similar to those of amended Claim 18. Thus, Applicants respectfully submit that Claims 52 and 57 (and any claims dependent thereon) patentably distinguish over Yamaguchi, for at least the reasons stated for Claim 18.

With respect to the rejection of Claim 25 as anticipated by Yamaguchi, Applicants respectfully traverse this ground of rejection. Claim 25 recites, *inter alia*, “wherein convergences of the pre-deflection imaging units differ from each other relatively to a sequence in which the light source units are aligned in the first direction.”

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<sup>1</sup> Yamaguchi, col. 8, lines 43-46 and Figs. 2, 3, and 6 of Yamaguchi.

The outstanding Office Action does not address the subject matter of Claim 25.

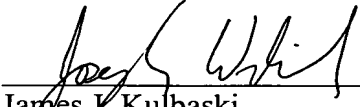
Furthermore, Yamaguchi does not disclose or suggest the above-noted feature of Claim 25.

Finally, it appears that the Lists of Related Cases filed on September 5, 2006 and July 26, 2006 were not considered because the publication numbers of the related cases were not listed. However, the filing dates of these related application is April 26, 2006 and June 16, 2006. Thus, these related applications have not been published yet. Applicants have furnished this information to make the Examiner aware of other applications, and no such format is required of such information.<sup>2</sup> Thus, Applicants respectfully request that the above-noted Lists of Related Cases be considered and an initialed copy of the Lists of Related Cases be sent to the undersigned.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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<sup>2</sup> See MPEP § 2001.06(b).